

**UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT**

**KSENIIA PETROVA,**

Petitioner-Plaintiff,

v.

**U.S. DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM**, Secretary of the  
U.S. Department of Homeland Security, in her  
official capacity; **THERESA MESSIER**,  
Superintendent, Chittenden Regional Correctional  
Facility, in her official capacity,

Respondents-Defendants.

Case No. 2:25-cv-00240-CR

**PROPOSED ORDER**

Recognizing that Petitioner remains subject to removal proceedings in immigration court, and Federal Respondents' legitimate interests in the administration of removal proceedings, the Court hereby amends its May 28, 2025, order releasing Petitioner under *Mapp v. Reno*, to add the following conditions of release:

- If released from the custody of the U.S. Marshals during the pendency of *United States v. Kseniia Petrova*, 1:25-mj-05150-JGD (D. Mass.), Petitioner must report to Boston Enforcement and Removal Operations (ERO) within twenty-four hours. The ERO office is located at 1000 District Ave., Burlington, MA 01803. The ERO office may be contacted by calling (781) 359-7500.
- Petitioner must comply with ICE's Alternatives to Detention, Intensive Supervision Appearance Program (ATD-ISAP), including wearing a Global Positioning System (GPS) monitoring device.

- Petitioner must report for any hearing or interview as directed by U.S. Immigration and Customs Enforcement (ICE) or the Executive Office for Immigration Review (EOIR).
- Petitioner must surrender for removal from the United States if so ordered pursuant to a final order of removal.
- Petitioner must not change her place of residence without first securing written permission from her assigned ERO officer.
- Petitioner must advise her assigned ERO officer in advance of any overnight travel outside the state of Massachusetts.
- Petitioner must not violate any local, State or Federal laws or ordinances, including, but not limited to:
  - o 18 U.S.C. § 922(g)(5) (relating to possession of firearms by aliens);
  - o 8 U.S.C. § 1302 (relating to registration as an alien);
  - o 8 U.S.C. § 1304(e) (relating to the need to carry proof of registration); and
  - o 8 U.S.C. § 1305(a) (relating to timely updating address changes).
- Petitioner must assist ICE in obtaining any necessary travel documents.
- Petitioner must not associate with known gang members, criminal associates, or be associated with any such activity.
- Petitioner must report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- Petitioner must continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.

- Petitioner must provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- Petitioner must provide ICE with written responses from the Embassy or Consulate regarding your request.

Failure to abide by these conditions of release may result in Petitioner being taken into ICE custody, as well as the possibility of being criminally prosecuted.

ICE shall serve Petitioner with a Form I-220A, Order on Release on Recognizance, that is consistent with the Court's May 28, 2025, Order, as well as the approved conditions of bail listed in this Order.

DATED at Burlington, in the District of Vermont, this \_\_\_\_ day of May, 2025.

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Hon. Christina Reiss, Chief Judge  
United States District Court